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February 24, 2014

**VIA ECF**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 630  
New York, NY 10007

**Re: Island Partners, et al. v. Deloitte & Touche, LLP, 1:05-cv-02770 (JMF)  
In re Adelphia Communications Corp. Securities & Derivative Litigation, 1:03-md-01529  
(JMF)**

Dear Judge Furman:

We represent Deloitte & Touche, LLP ("Deloitte") in the above-captioned action. Enclosed please find a stipulation and proposed order to permit Deloitte to depose John Rigas and Timothy Rigas (collectively, "the Rigases") who are each confined in prison.

John Rigas and Timothy Rigas were owners, officers and/or directors of each of Adelphia Communications Corporation, Highland Holdings, GP, Highland Preferred Communications 2001, LLC, Highland Prestige Georgia, Inc., Highland Video Associates, LP, Hilton Head Communications, LP and Coudersport Television Cable Company at all times relevant in this action and have intimate knowledge of the events and circumstances alleged in this case. The Rigases are incarcerated at FCI Allenwood in White Deer, Pennsylvania, as a result of their criminal convictions which were upheld in *United States v. Rigas*, 490 F.3d 208 (2d. Cir. 2007).

Because the Rigases are incarcerated, leave of court is required before they may be deposed. See Fed. R. Civ. P. 30(a)(2)(B). As set forth in the attached stipulation and proposed order, plaintiffs and Deloitte have agreed that Deloitte is permitted to depose John and Timothy Rigas on March 7 and February 28, 2014, respectively.

Respectfully Submitted,

**DLA Piper LLP (US)**

A handwritten signature in blue ink, appearing to read 'Tim Hoeffner', written over a horizontal line.

Timothy E. Hoeffner

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE ADELPHIA COMMUNICATIONS  
CORPORATION SECURITIES AND  
DERIVATIVE LITIGATION

03 MDL 1529 (JMF)

This Document Relates To:

**STIPULATION**

*Island Partners, et al. v. Deloitte & Touche LLP*  
(05-CV-2770)

**STIPULATION AND PROPOSED ORDER TO DEPOSE INCARCERATED**  
**PLAINTIFFS**

**WHEREAS** John Rigas is an individual incarcerated at FCI-Allenwood in White Deer, Pennsylvania

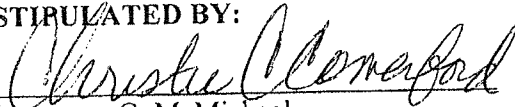
**WHEREAS** Timothy Rigas is an individual incarcerated at FCI-Allenwood in White Deer, Pennsylvania.

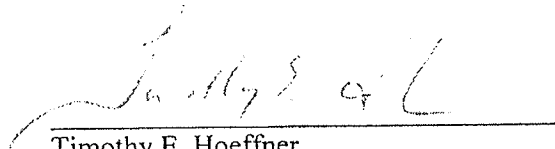
**WHEREAS** Deloitte & Touche LLP ("Deloitte") intends to depose John and Timothy Rigas (collectively "the Rigases") because of their knowledge of events and circumstances alleged in the Complaint.

**WHEREAS** Federal Rule of Civil Procedure 30(a)(2)(B) requires leave of the court to take the Rigases depositions because they are incarcerated. *See* Fed. R. Civ. P. 30(a)(2)(B).

**NOW THEREFORE**, the parties agree and stipulate that Deloitte is permitted to take the deposition testimony of the Rigases.

**STIPULATED BY:**

  
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*Attorneys for Defendant*

Dated: 2-20-14

Dated: February 18, 2014

**SO ORDERED AND APPROVED:**

Dated: New York, New York  
February \_\_\_\_, 2014

\_\_\_\_\_  
The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York